

United States District Court

APR 10 2015

SOUTHERN

DISTRICT OF
McALLEN DIVISION

TEXAS

David J. Draboy, Clerk

UNITED STATES OF AMERICA
V.

CRIMINAL COMPLAINT

Aurora Castellanos-Lara

A074 398 576

YOB: 1973

Principal

the United Mexican States

Case Number:

M-15-0563-M

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about 4/09/2015 in Hidalgo County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Ramon Palacio-Sanchez, citizen and national of the United Mexican States and Edwin Xitumul-Lopez, citizen and national of Guatemala, along with ten (10) other undocumented aliens, for a total of twelve (12), who had entered the United States in violation of law, concealed, harbored or shielded from detection or attempt to conceal, harbor, or shield from detection such aliens in any place, including any building or means of transportation,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(iii) FELONY

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On April 09, 2015, the Rio Grande Valley (RGV) Fraud Intelligence Team (FIT) was advised by San Juan Police Department that they needed assistance at a stash house located at 1304 East Prosperidad Drive Pharr, Texas (Target Location).

Sargent Rolando Garcia from the San Juan Police Department advised information was received from the Crime Stoppers Tip Line regarding the possible stash house.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

Approved
Joseph Leonard

☒ Yes ☐ No

Signature of Complainant

Francisco Sanchez Senior Patrol Agent

Printed Name of Complainant

Sworn to before me and subscribed in my presence,

April 10, 2015

Date

at McAllen, Texas

City and State

Dorina Ramos, U. S. Magistrate Judge

Name and Title of Judicial Officer

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

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CONTINUATION:

At approximately 1339 hrs, Sargent Garcia and Lieutenant Alafa, conducted a consensual "Knock and Talk" along with other San Juan Police Officers at the target location. The owner of the residence identified herself as Aurora Castellano-Lara. Officers advised the owner of the information they had received and requested verbal and written consent to search her residence. Consent was granted and the search resulted in the discovery of 12 possible undocumented aliens.

At Approximately 1400 hours, FIT Agents arrived at the target location and conducted an immigration inspection on all the subjects which resulted in all 12 being undocumented aliens. Aurora Castello-Lara was also found to be an undocumented alien. All subjects were placed under arrest and were transported to the Weslaco Border Patrol Station for processing.

At the Weslaco Border Patrol Station, biometric data was taken from every member of the group and through these checks and further investigation, Aurora Castellano-Lara was identified as the caretaker.

PRINCIPAL

Aurora Castellanos-Lara was advised of her Miranda Rights and provided a sworn statement without an attorney present.

Castellanos stated she lives at 1304 Prosperidad Dr, in Pharr, Texas. She also states that she owns the trailer house located at the address. She states she was asked for consent to enter her residence and she agreed. She also stated that she signed a consent form provided by the officer. Castellanos states that she and 5 other individuals were rolling newspapers. She claims that she knew individuals were illegal in the United States. Castellanos also stated there were more people in a small additional room attached to the trailer house. She claims to be renting the small room to a man named Jose Trevino and he put the people in the room. She states that she didn't know the people in the room were illegal. She also stated that she has been arrested numerous times by Border Patrol and also deported.

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CONTINUATION:

MATERIAL WITNESS 1

Ramon PALACIO-Sanchez was advised of his Miranda Rights and provide a sworn statement without an attorney present.

PALACIO stated he made his smuggling arrangements with a man in Miguel, Aleman, Tamaulipas, Mexico. He paid \$1,050 USD to be smuggled into the United States and needed to pay an additional \$3,450 USD in order to be taken to Houston, Texas. PALACIO claims he and three additional persons entered the United States illegally by crossing the Rio Grande River near Miguel Aleman on March 23, 2015 at 9:00 pm. They were picked up in a black four door sedan and taken to a house. They stayed one night at that house and the next day were transported to the target location where he was arrested. Sanchez states he has been in the residence for a total of 18 days and would sleep in the living room or in the outside house. Subject stated that "Aurora" was the person in charge of the stash house, and would give them instructions. Aurora knew he was undocumented and would instruct him and the others to stay inside and stay quiet in order to avoid detection from the people outside of the residence. She would supply both food and water twice a day. Subject stated Aurora ordered him to take her vehicle and go to the neighboring market in order to buy 2 lbs. of meat in order to cook for everyone at the residence. PALACIO claims when he arrived at the residence there was approximately six people at the house. PALACIO also stated that individuals would be dropped off at random times by different people usually in groups of two to three. He claims approximately 30 people arrived during his stay. He also stated that on three different occasions eight subjects were picked up and taken up north.

SANCHEZ identified, Aurora Castellano-Lara, in a photo lineup as the caretaker of the house.

MATERIAL WITNESS 2

Edwin XITUMUL-Lopez was advised of his Miranda Rights and provide a sworn statement without an attorney present.

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CONTINUATION:

XITUMUL states he made his smuggling arrangements with a man in Guatemala. He was to pay about \$6500 USD to be smuggled to his destination in the United States. Subject claims he crossed the river with seven others and two guides. After crossing the river they were picked up by a truck and taken to the target location where he was arrested. XITUMUL states that when he arrived at the residence the driver told them to go inside a room and not come out. XITUMUL stated that shortly after a female caretaker greeted and provided them with instructions of when they could leave the room. XITUMUL stated that they had to use a bucket as a makeshift restroom since the room they were forced to be in did not have one. XITUMUL claims that females would take them food and drinks to them. He stated that the female caretaker would also ask them for money in order for her to buy food and cook for them. Subject stated he has given the female caretaker \$45 USD. XITUMUL stated that he has eaten a total of four out of the five days since he has been there. XITUMUL stated that when he arrived and the target location he observed three males already there and an additional male arrive during his stay.

XITUMUL identified, Aurora Castellano-Lara, in a photo lineup as the caretaker of the house.